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1000 Friends of Wisconsin Comments on Indirect Source Rule Revision September 14, 2006

(Prepared by Ward Lyles, Transportation Policy Director)

1000 Friends of Wisconsin welcomes efforts by the DNR and stakeholders to reduce emissions during the construction of new roadway projects. Employing road construction practices that result in the cleanest possible air is imperative for individual and public health.

We support best management practices for reducing emissions from construction equipment. The examples from New Haven, Connecticut and the Dan Ryan Expressway in Chicago provide practical solutions to the problem of managing emissions during construction. Idling limitations, retrofitting emission control devices, using ultra-low sulfur diesel fuels, and employing staging zones are promising strategies that we support.

We also support requiring the optimization of traffic signalization, on both state and local roads and highways, prior to the addition of any new highway capacity in order to maximize the capacity of existing road networks. This measure is important not only for air quality purposes, but also because of fiscal constraints.

The ongoing work of the legislative "Road to the Future Committee" has shown that Wisconsin does not have enough money to pay for the highway expansion plans on the table, not to mention current maintenance needs. An August 2006 report from DOT showed \$1.7 billion in projected cost overruns on existing major highway projects. All of this comes on the heels of a decrease in driving statewide in 2005 and a projected decrease again in 2006 due in large part to rising gas prices. Before millions, or billions, of dollars are spent on highway capacity expansion, it is only prudent to maximize existing capacity through measures such as optimizing traffic signalization.

In addition to traffic signalization, planned transit improvements, such as the 70% increase in transit service outlined in SEWRPC's Regional Transportation Plan, need to be fully implemented before any highway expansion work is done as well. The case for massive transit improvements is broad, but surely includes benefits such as reducing single-occupancy driving that contributes to lower air quality, as well as serving as a viable alternative while construction disrupts traffic flow.